

KML LAW GROUP, P.C.  
A Professional Corporation incorporated in Pennsylvania  
216 Haddon Avenue, Ste. 406  
Westmont, NJ 08108  
(215) 627-1322  
Attorneys for Toyota Lease Trust

IN THE MATTER OF:

Nelson I. Antonio aka Pedro I Antonio aka Pedro I  
Antonio De Los Santos aka Pedro Antonio De Los  
Santos

DEBTOR(S),

Liriana Reyes  
CO-DEBTOR

TO:

Nelson I. Antonio aka Pedro I Antonio aka Pedro I Antonio De Los Santos aka Pedro Antonio De Los Santos  
14 Kay Lane  
Sicklerville, NJ 08081

Liriana Reyes  
14 Kay Lane  
Sicklerville, NJ 08081

Brad J. Sadek  
Sadek and Cooper  
1315 Walnut Street, Suite 502  
Philadelphia, PA 19107

Isabel C. Balboa Esq.  
Chapter 13 Standing Trustee  
Cherry Tree Corporate Center - 535 Route 38 - Suite 580  
Cherry Hill, NJ 08002

US TRUSTEE  
Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 19-10706 ABA

**NOTICE OF MOTION FOR RELIEF  
FROM STAY & CO-DEBTOR STAY**

PLEASE TAKE NOTICE THAT the undersigned attorney for **Toyota Lease Trust**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **401 Market Street, P.O. Box 2067; Camden, NJ**, for an Order to Grant Relief from the Automatic Stay & Co-Debtor Stay to authorize the moving parties to prosecute a repossession action for the reason that the debtors and Liriana Reyes, Co-Debtor have failed to maintain their monthly payments to the Secured Creditor as more particularly set forth in the certification submitted herewith.

The property involved is known as **2018 Toyota Tundra C4X4, VIN: 5TFAY5F14JX737639**, . The hearing on this matter is scheduled for **July 23, 2019 at 10:00 A.M.**

Dated: June 28, 2019

**/s/Rebecca A. Solarz, Esq.**

Brian C. Nicholas, Esquire

Rebecca A. Solarz, Esquire

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